

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re:

Chesapeake Television Licensee, LLC

Petition for Special Relief for Waiver of
Section 76.92(f) & 76.106(a) of the
Commission's Rules

Docket No. 13-181

CSR-8818-N

OPPOSITION OF ANNE ARUNDEL COUNTY, MARYLAND

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SUMMARY

Anne Arundel County opposes this Petition for Special Waiver. The Petitioner is a Baltimore, Maryland Fox television station, WBFF, that seeks waiver of the “significantly viewed” status of the Washington, DC Fox television station, WTTG, in the unincorporated community of Glen Burnie, in Anne Arundel County, as well as three other communities in Howard and Harford counties.

“Significantly viewed” status is assigned to broadcast stations that have a large viewing audience outside of their own DMA. A main purpose is to protect the right of those television viewers to view the station on their cable system or satellite service without programming blackouts. Historically, viewer interest in the station outside the DMA has been measured based on over-the-air viewership. The three counties named in the Petition are in the Baltimore Designated Market Area (DMA). WTTG is in the Washington, DC DMA but has been on the “significantly viewed” list and available to residents of these counties for more than 40 years.

The County urges the Commission to deny the Petition for the following reasons:

- Although the Anne Arundel County was assigned to the Baltimore DMA, it is located between Baltimore and Washington, and its residents have strong and enduring ties to the Washington, DC DMA. It is important for all residents to continue to view WTTG without programming blackouts.
- The Petitioner relies on stale over-the-air viewership data which was collected in 2007 and 2008, prior to the digital television transition.
- Over-the-air data is no longer a reliable measure of viewership in Anne Arundel County. The Commission has previously recognized that high cable penetration rates could be a factor in evaluating over-the-air viewership data. The cable and satellite penetration in Anne Arundel County is estimated to exceed 98%. In these circumstances, it would be inappropriate and unreasonable to change the “significantly viewed” status of WTTG in Glen Burnie or anywhere in Anne Arundel County solely on the basis of over-the-air viewership data.
- If the Petition is granted, it will pave the way for programming on WTTG to be blacked out not only for residents of Glen Burnie, but due to technical cable system issues, potentially throughout the County, disrupting the public’s viewing patterns and causing unnecessary confusion for residents.

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OPPOSITION OF ANNE ARUNDEL COUNTY, MARYLAND

Pursuant to 47 C.F.R. § 76.7, Anne Arundel County, Maryland hereby opposes the petition for special relief (“Petition”) filed by Chesapeake Television Licensee, LLC (“Petitioner”) in the above-captioned proceeding.

I. INTRODUCTION

Anne Arundel County has a strong interest in the outcome of this proceeding, as the representative of both the residents of the unincorporated community of Glen Burnie which is the target of the Petition, and of residents in the rest of the County who will also be negatively impacted if the Petition is granted. The Petitioner seeks a change in the status of the Washington, DC Fox television station, WTTG, a channel that has been on the “significantly viewed” list and available to residents of the County for more than 40 years. The Petitioner asks for the waiver of the station’s “significantly viewed” status on the basis of stale data on the over-the-air television viewing habits of a handful of residents of the unincorporated community of Glen Burnie, a community which itself represents just over 10% of the County’s population and one that has strong ties to Washington, DC. If the Petition is granted, it will pave the way for certain programming on WTTG to be blacked out not only for residents of Glen Burnie, but due

to technical issues, potentially throughout the County, disrupting the public's viewing patterns and causing unnecessary confusion for residents. Not only is the data stale and limited, the circumstances require the Commission to modify its current approach of relying solely on over-the-air data to make this type of waiver determination. Further, a special relief petition must meet a public interest criterion,¹ and it would not serve the public interest to grant this Petition given the unique location and history of Anne Arundel County described herein.

II. WASHINGTON DC STATIONS, ESPECIALLY WTTG, ARE IMPORTANT VIEWING FOR RESIDENTS THROUGHOUT MARYLAND, INCLUDING IN ANNE ARUNDEL COUNTY

Exhibit A contains a map depicting the counties of Maryland,² and Exhibit B contains the Commission's "significantly viewed" stations list for Maryland counties, current as of June 28, 2013.³ The list demonstrates the importance of WTTG and Washington, DC stations to Maryland counties generally. Every county except Cecil County, located in the most northeastern corner of the state, and Garrett County, located in the most northwestern corner of the state, has WTTG, on its "significantly viewed" stations list. In most counties, including Anne Arundel, there are other Washington, DC stations on the list as well.

In light of the lengthy and widespread history of carriage of WTTG and other Washington, DC stations throughout most of Maryland, the Petitioner's very narrow request for waiver seems tactical rather than evincing a meaningful change in viewing patterns in these communities. The Petitioner seeks the waiver for only four communities – Glen Burnie in Anne

¹ 47 C.F.R. § 76.7(a)(4)(i) ("The petition or complaint shall . . . support a determination that a grant of such relief would serve the public interest.").

² The map of Maryland counties is also available online at http://quickfacts.census.gov/qfd/maps/maryland_map.html (last accessed July 31, 2013).

³ The Commission's "significantly viewed" stations list is available at <http://transition.fcc.gov/mb/significantviewedstations062813.pdf> (last accessed July 31, 2013). Exhibit B contains the listings for Maryland, on pages 181-186.

Arundel County, Ellicott City and Columbia in Howard County, and Bel Air in Harford County – so that it may exercise its network nonduplication and syndicated exclusivity rights against WTTG ostensibly only in these communities. The Petitioner describes these communities as “unquestionably Baltimore-centric communities”⁴ creating the impression that they are all strongly tied to the Baltimore DMA and not Washington, DC. Yet strikingly, Baltimore’s “significantly viewed” list includes WTTG, and WTTG is not subject to the application of the Commission’s exclusivity rules or subject to programming deletions in Baltimore, nor is Baltimore included in this Petition.⁵ Indeed, since the “significantly viewed” list was created in 1972, an additional Washington, DC station was *added* to Baltimore’s “significantly viewed” list, evidence of a continuing interest in Washington, DC stations even in Baltimore.⁶

In Anne Arundel County, the strong interest in Washington, DC stations is evidenced by the fact that its “significantly viewed” list includes more Washington, DC stations than Baltimore stations. There are five Washington, DC stations on the list and only four Baltimore stations.⁷ The high level of interest in Washington, DC stations in Anne Arundel County is due to its geographical and community ties to the nation’s capital. Anne Arundel County centrally located between Baltimore and Washington, DC. The County is assigned to the Baltimore Designated Market Area (DMA) but it could just as easily have been assigned to the

⁴ Petition at page 1.

⁵ WTTG is currently subject to program deletions in two Maryland counties, Worcester and Somerset. *See* Exhibit B (page 185). These counties are located on the Delmarva Peninsula at the southeastern most portion of Maryland and the waivers do not involve the Petitioner’s station.

⁶ *See* Exhibit B (page 182) listing WDCA under Baltimore’s list, with a “+” sign denoting the station was added to the list after 1972.

⁷ *See* Exhibit B (page 181-2).

Washington, DC DMA because of its very close proximity and ties to the nation's capital.⁸ These ties have a long history; Annapolis served as the United States' first peacetime national capital from 1783 to August 1784. And these ties continue unabated today. Many Anne Arundel County residents work in Washington, DC or in surrounding counties that lie in the Washington, DC DMA. Numerous federal government institutions are located in the County and employ large numbers of County residents. For example, the County is home to major military installations, such as the United States Naval Academy and Fort George Meade. It is also home to the National Security Agency. These are just some of the reasons why full access to local Washington, DC stations such as WTTG is very important to Anne Arundel County residents, including residents of Glen Burnie.⁹

In light of the above, it would be odd indeed for Glen Burnie or the two Howard County communities named in the Petition – all three of which are located geographically southwest of Baltimore and towards Washington, DC – to have a strong preference for Baltimore programming and less interest in WTTG than the residents of Baltimore itself. But that is what the Petitioner asks the Commission to believe.¹⁰

⁸ This is demonstrated quite compellingly by the digital broadcast coverage maps of WBFF and WTTG, both of which encompass Anne Arundel County. These maps are included in Exhibit C hereto.

⁹ See Declaration of Laura Neuman, County Executive, Anne Arundel County, included as Exhibit D hereto.

¹⁰ A more likely explanation for the Petition is that, for tactical reasons, the Petitioner has fashioned its narrow waiver request in an attempt to capitalize on the opportunity provided by the current rules which permit it to rely on insignificant data about Glen Burnie in a community-specific waiver application when the County-wide or system-specific data for Anne Arundel County would not support a waiver request. By focusing only on a community with a small data set that superficially meets the waiver requirements, the Petitioner can hope to obtain a waiver that, while ostensibly limited to the community of Glen Burnie, will for technical reasons in all likelihood allow the Petitioner to exercise its rights over a broader geographic area of the County. Technical issues are discussed further in the next section. This may offer several unmerited advantages for the Petitioner. For example, by being able to exercise its non-duplication and syndication rights against WTTG, the Petitioner will strengthen its hand in

III. THE COMMISSION MUST REJECT THE DATA SET ON WHICH THE PETITION IS BASED

A. THE DATA IS STALE

The Petitioner relies on Nielsen data from February and July 2007 and February and July 2008 in the Petition filed in July 2013, more than six years after the first data samples were taken. The data is old. Moreover, it predates a very significant development in over-the-air broadcast network station delivery – the transition to digital television in 2009. On the basis of the age of the data alone, the Petition should be rejected.

B. THE DATA SET IS TOO SMALL TO BE A CREDIBLE INDICATOR OF WTTG VIEWERSHIP IN THE COMMUNITY

As discussed above, the Petitioner seeks the waiver for only one community in Anne Arundel County, Glen Burnie. The population of Glen Burnie in the 2010 census was 67,639, and it had 28,013 housing units. The sample size in the Petition was 8 households in 2007 and 5 households in 2008. This data set is obviously insignificant.

The small data set is undoubtedly due to the fact that the existing definition of “significantly viewed” that was adopted by the Commission in 1972 only considers “over-the-air” households. Anne Arundel County began issuing competitive cable TV franchises in the 1970s, and had 6 cable companies operating in the county at the same time by 1985. Today, due to a combination of cable industry consolidation and entry into the video market by the local telephone company, Glen Burnie, and indeed most of the County, is served by three cable operators (Comcast, Verizon and Anne Arundel Broadband). In fact, Anne Arundel County was

retransmission consent negotiations with the cable and satellite providers because it will be able to block the carriage of popular network programs on an alternative Fox channel carried by the same providers. This may lead to increased programming fees that will be passed through to residents through higher prices. Or it may lead some or all of the providers to cease carriage of WTTG due to lower viewership caused by the blackouts, or to avoid the costs of having to manage programming blackouts.

one of the first communities in America to lose rate regulation upon a finding of effective competition under the competitive provider test.¹¹ The County estimates that 78% of County households currently subscribe to cable.¹² Video service is also available from two satellite providers (Dish and DirecTV). Estimates of satellite penetration by DMA show that subscription to “Alternative Delivery Systems” is at 21.6% in the Washington, DC DMA and 20.9% in the Baltimore DMA.¹³ As a result of these high levels of satellite and cable penetration, it is not surprising that the number of “over-the-air” households in the County is very small, and that is reflected in the tiny data sample for Glen Burnie relied upon in the Petition.

While the Commission has previously stated that there is no requirement that a specific minimum number of in-tab diaries be used to calculate the average audience in a specific community in each survey period,¹⁴ judging the viewing habits of the entire community of Glen Burnie (and in effect potentially the entire County) based on the habits of a handful of “over-the-air” households is simply not reasonable given the evolution of the local television viewing market described above. And, for the reasons described below, the Commission is compelled to modify the rules that would allow a determination to be made based on such data.

¹¹ *In the Matter of Jones Intercable Inc.*, 11 FCC Rcd 3583 (1996); *see also In the Matter of InterMedia Partners L.P.*, 12 FCC Rcd 2425 (1997).

¹² This is roughly in line with cable penetration estimates for the Washington, DC and Baltimore DMAs, which are at 74.4% and 70.8% respectively. *See* ADS, OTA and Wired-Cable Penetration by DMA reported on the website of the Television Bureau of Advertising (TVB), the not-for-profit trade association of America’s commercial broadcast television industry, available at http://www.tvb.org/media_comparisons/4729/ads_cable_dma?ads_archive=&sort_by=field365442&pg= (last accessed July 31, 2013).

¹³ *Id.*

¹⁴ *Gulf-California Broadcasting Company*, CSR-7050-N, 23 FCC Rcd 7406, 7411 (2008); *In the Matter of Barrington Kirksville Licensee LLC*, CSR-8648-N, Memorandum Opinion & Order, DA 13-455 (rel. March 18, 2013), ¶14.

**C. THE COMMISSION'S OWN PRONOUNCEMENTS REQUIRE IT
TO REJECT THE DATA BASED ON THE FACTS AND
CIRCUMSTANCES IN ANNE ARUNDEL COUNTY**

In the County's view, in light of the changed viewership patterns described above, the Commission cannot grant the instant Petition and upset the *status quo* in place for over forty years based solely on over-the-air viewership data such as that presented in the Petition even if the Petitioner were to submit more current data.

The Commission has an obligation to engage in reasoned decision making.¹⁵ This obligation commands that the now antiquated rules relying solely on over-the-air viewership data be modified to adjust to current realities. The Commission has itself recognized that if viewership through cable systems or satellite systems increased substantially, this could factor *against* continuing to rely solely on over-the-air viewership numbers in making waiver determinations. In the Commission's 1986 decision concerning KCST-TV in San Diego, cited by the Petitioner for other reasons, the Commission stated:

While not particularly germane in the instant case (in which cable penetration in the San Diego ADI at the time the pertinent data was collected was about 40 percent), ***the penetration rate of the cable system could be a factor in determining significantly viewed status.*** This was a concern raised by Judge Scalia. *KCST-TV, Inc. v. FCC*, 699 F.2d at 1199 (Scalia, J., dissenting). ***In appropriate circumstances, this will be a concern of the Commission in evaluating off-air viewing data submitted.***¹⁶

The comments of Justice Scalia which prompted the Commission's statement are quoted at length below as they presage with striking precision the viewership situation currently in Anne Arundel County. Justice Scalia, dissenting from the majority opinion which struck down the

¹⁵ See *Cellnet Commc'ns v. FCC*, 149 F.3d 429, 442 (6th Cir. 1998) ("If the FCC's predictions about the level of competition do not materialize, then it will of course need to reconsider its sunset provisions in accordance with its continuing obligation to practice reasoned decision making.").

¹⁶ *In re: KCST-TV, INC.; Petition for Special Relief*, 103 F.C.C.2d 407, 413 (FCC 1986) (emphasis added).

Commission's approach of "once-in, always-in" for the "significantly viewed" stations list, outlined the following concerns about relying solely on over-the-air viewership numbers as cable subscribership increased over time:

Another compelling reason for the "once-in, always-in" approach is the distortion of the over-the-air viewing percentages caused by cable carriage once it is permitted. Assume, for example, a county in which a distant signal met the "significantly viewed" percentages in the 1970 survey because of large off-the-air viewership in the county's northeast quadrant. Assume, further, that a cable system has since "wired" 80% of the homes in that northeast quadrant, so that four out of five viewers who previously watched the station "off the air" no longer do so. The station would then no longer meet the "significantly viewed" standard, even though it is no less "local" than it ever was. There is, in other words, no way to reconstruct off-the-air viewing patterns once cable has been carrying the signal. It seems very likely that those viewers most loyal to a relatively weak not-so-distant distant signal would have been first in line to "get wired." To be sure, the Commission's approach permits significant viewing to be considered as one of the relevant factors where financial distress has been shown, but in that context it can be discounted for the sort of distortion just described and in any event need not determine the outcome. But making such an inherently unreliable factor the very touchstone of entitlement to relief is quite another matter.¹⁷

As noted above, the Commission determined that a cable penetration rate of about 40% did not give rise to concern in evaluating over-the-air viewing data. But it anticipated the cable penetration rate *would* be of concern in evaluating over-the-air viewing data "in appropriate circumstances." The facts and circumstances surrounding the instant Petition are exactly the type that should raise serious concerns for the Commission. These include the high penetration rate for cable system and satellite subscribership, the geographic location of Anne Arundel County between Baltimore and Washington, DC, the large number of Washington, DC stations on the County's "significantly viewed" list, the ongoing ties of County residents to the Washington, DC area and the County-wide pattern of cable system development in the County discussed below. These facts and circumstances all point strongly to the need for the

¹⁷ *KCST-TV, Inc. v. Federal Communications Comm'n*, 699 F.2d 1185, 1199 (D.C. Cir. 1983)(emphasis added; citations omitted).

Commission to reject the possibility that it would grant this Petition, or indeed any petition for waiver of “significantly viewed” status affecting stations in Anne Arundel County solely on the basis of over-the-air viewership data whether on a community basis, a cable system basis, or on a County-wide basis. The circumstances of television viewership in the County have changed too profoundly to allow the Commission to upset viewer expectations anywhere in the County on the basis of such “inherently unreliable” data.¹⁸ The Commission must deny the Petition and consider crafting appropriate rules for considering future ones.

IV. BLACKING OUT PROGRAMMING ONLY IN GLEN BURNIE WITHOUT AFFECTING THE REST OF ANNE ARUNDEL COUNTY WILL BE DIFFICULT IF NOT IMPOSSIBLE BECAUSE ANNE ARUNDEL COUNTY GENERALLY DID NOT DEVELOP “LOCALIZED CABLE SYSTEMS” ON A COMMUNITY BY COMMUNITY BASIS

If the Petition is granted with respect to Glen Burnie, the Petitioner will be free to enforce its network nonduplication and syndicated exclusivity rights against WTTG presumably only in Glen Burnie. However, for technical reasons due to the historical development of cable systems in Anne Arundel County, limiting the blackouts to Glen Burnie is likely to be difficult if not impossible.

Anne Arundel County has a population of more than half a million residents.¹⁹ Exhibit E shows the incorporated and unincorporated (designated) communities of the County based on

¹⁸ As Justice Scalia also noted, another reason for preferring the “once-in, always-in” approach was “it avoids the disruption of the public's viewing patterns....[S]ince the mandatory carriage and network nonduplication rules operate in tandem, that loss of the [significantly viewed] status will permit a cable system to drop a station that cable viewers in the area have received regularly and that at least a substantial number of such viewers regard as ‘local.’” *Id.*

¹⁹ Population figures referenced herein are taken from the U.S. Census Bureau’s Maryland QuickFacts webpage available at <http://quickfacts.census.gov/qfd/states/24000.html> (last accessed on July 31, 2013).

Census Bureau data.²⁰ As demonstrated by the blue shading on the map, only two areas of the County are incorporated – Annapolis and Highland Beach.²¹ Annapolis has less than 40,000 residents, and Highland Beach has less than 100 residents. Thus, the vast majority of the County’s residents live in unincorporated areas of the County, some of which are “census designated places” according to the Census Bureau.²² Glen Burnie is one such census designated place.

The Commission keeps a list of registered cable communities,²³ and has previously observed that “[d]ue to the localized nature of cable systems, cable communities were easily defined by the geographic boundaries of a given cable system, which were often, but not always, coincident with a municipal boundary and varied as determined on a case-by-case basis.”²⁴ The fact that Anne Arundel County has very few incorporated communities has meant it falls

²⁰ The map is also available online at <http://www.mdp.state.md.us/msdc/census/cen2000/maps/PLC00/anneplc.pdf> (last accessed on July 31, 2013).

²¹ By contrast, Montgomery County, Maryland is geographically smaller than Anne Arundel County yet has nearly twice the population and has 23 incorporated towns. See the list of incorporated towns in Maryland available online at <http://www.dat.state.md.us/sdatweb/towncode.html> (last accessed on July 31, 2013).

²² A “census designated place” or CDP is defined by the Census Bureau as follows: “CDP is the abbreviation for Census designated place, the statistical counterpart of incorporated places and are delineated to provide data for settled concentrations of population that identifiable by name but are not legally incorporated under the laws of the state in which they are located. CDPs are delineated cooperatively by state and local officials and the Census Bureau, following Census Bureau guidelines.” See, http://factfinder2.census.gov/help/en/glossary/c/census_designated_place_cdp.htm (last accessed on July 31, 2013).

²³ The current list is available here: <http://www.fcc.gov/encyclopedia/cable-communities-registered-fcc> (last accessed on July 31, 2013).

²⁴ *In the Matter of Implementation of the Satellite Home Viewer Extension and Reauthorization Act of 2004; Implementation of Section 340 of the Communications Act*, 20 FCC Rcd 17278, 17297 (2005) (citations omitted).

squarely within the exception noted by the Commission, that is, its cable systems are not coincident with municipal boundaries.

Currently, three cable operators serve residents under County-issued cable franchises, Comcast, Verizon, and Anne Arundel Broadband. Exhibit F contains an excerpt of the Commission's list of registered cable communities, commonly known as CUIDs, specifying all the currently active cable community units in Anne Arundel County. Only one of the three cable operators serving Glen Burnie, Comcast, actually identifies Glen Burnie as a community unit. But none of the cable systems franchised by the County were constructed to be, or are today, community based systems. All were granted franchises to serve regions of the County. And this is reflected in the consolidated nature of the cable systems themselves. One cable system serves County residents from a single cable headend located in the County; another serves the County from two headends, one located in the City of Annapolis and another located in the western part of the County; the third serves the County from a regional headend located in a nearby county.

As a result, it is not at all clear that any of the cable systems operating in the County can reasonably be in a position to black out programming only to viewers in Glen Burnie without technical modifications to its system. Absent such modifications, if the Petition is granted and it is necessary to black out programming to Glen Burnie, residents of the County not located in Glen Burnie may also be subjected to programming blackouts although the Petition did not cover those geographic areas.

V. THE PUBLIC INTEREST WOULD NOT BE SERVED BY GRANTING THIS PETITION

Finally, the Commission also has a duty to act in the public interest.²⁵ The unique situation of Anne Arundel County described above should be taken into account when

²⁵ *Supra*, note 1.

considering the public interest. An important public interest goal of the Commission is to promote localism. In the context of broadcast station market determinations for carriage of local broadcast stations, the Communications Act has delineated factors to consider that value localism. These are set out in 47 USC §534(h)(1)(C)(ii), and include a consideration of whether the station has historically been carried with the community, and whether it provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interest to the community. As discussed above, WTTG easily meets these criteria. It has historically been carried in the County, and it carries coverage of news, sporting and other events of interest to the residents of the County, including residents of Glen Burnie. Granting the Petition will likely result in harm to subscribers throughout the County such as overbroad blackouts and increased prices, as discussed above.

VI. CONCLUSION

For all of the above reasons, the County opposes the Petition and urges the Commission to deny it.

Respectfully submitted,



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Counsel for Anne Arundel County, Maryland

August 1, 2013

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CERTIFICATE OF SERVICE

I, Stephanie Pearson, a secretary with the law firm of Best Best & Krieger LLP, hereby certify that copies of the foregoing “OPPOSITION OF ANNE ARUNDEL COUNTY, MARYLAND” were served via U.S. Mail on this 1st day of August 2013 to the following:

RCN Corporation President Plaza, Bldg. 1 196 Van Buren St., Ste. 300 Herndon, VA 20170	Armstrong Cable Services One Armstrong Place Butler, PA 16001
Atlantic Broadband 330 Drummer Drive Grasonville, MD 21638	Easton Cable Attn: William D. Russell Cable & Communications Dept. Manager 201 N. Washington St. Easton, MD 21601
Regional Office for Maryland 406 Headquarters Dr., Suite 201 Millersville, MD 21108	Broadstripe 13455 Noel Road, Suite 1310 Dallas, TX 75240
MetroCast Communications 233 Colonial Ave Colonial Beach, VA 22443	MetroCast Communications 43920 Airport View Drive Hollywood, MD 20636
Verizon 1320 North Courthouse Road 9 th Floor Arlington, VA 22201	MetroCast Communications 11387 Ridge Road King George, VA 22485-4048
Citizens Telephone Coop. 201 East Main Street, Suite 5 Floyd, VA 24091-0159	Cox Communications 1400 Lake Hearn Drive Atlanta, GA 30319
Department of Technology and Communication Services Howard County 3450 Court House Drive Ellicott City, MD 21043	Howard County Executive Howard County 3420 Courthouse Drive Ellicott City, MD 21043
Mayor's Office Government of the City of Annapolis 160 Duke of Gloucester Annapolis, MD 21401	FOX Television Stations, Inc. Attn: Joseph M. Di Scipio 444 North Capitol Street, NW Suite 740 Washington, D.C. 20001

WJLA-TV ACC Licensee, LLC C/O WCIV 888 Allbritton Boulevard Mount Pleasant, SC 29464	Bel Air Town Administrator 39 N. Hickory Avenue Bel Air, MD 21014
WFDC-DT Telefutura D.C. LLC 5999 Center Drive, Suite 4083 Los Angeles, CA 90045	WUSA Detroit Free Press, Inc. c/o Gannett Co., Inc. 7950 Jones Branch Dr. McLean, VA 22107
WZDC-CA ONDA Capital, Inc. 2000 North 14 th Street, Suite 400 Arlington, VA 22201	WNVC Commonwealth Public Broadcasting Corporation 8101A Lee Highway Falls Church, VA 22042
WFPT Maryland Public Broadcasting Commission 11767 Owings Mills Boulevard Owings Mills, MD 21117	WETA-TV Greater Washington Educational Telecommunications Assn. 2775 South Quincy Street Arlington, VA 22206
WHUT-TV Howard University 2222 4 th Street, N.W. Washington, DC 20059	WNVT Commonwealth Public Broadcasting Corporation 8101A Lee Highway Falls Church, VA 22042
WDCA FOX Television Stations, Inc. c/o Dianne Smith 5151 Wisconsin Ave., NW Washington, DC 20016	WPXW-TV ION Media Washington License, Inc. 601 Clearwater Park Road West Palm Beach, FL 33401
WMDO-CA Entravision Holdings, LLC 2425 Olympic Blvd., Suite 6000 W Santa Monica, CA 90404-4030	WTTG FOX Television Stations, Inc. 5151 Wisconsin Ave., N. W, Washington, DC 20016
WDCW WDCW Broadcasting, Inc., Debtor-In- Possession 2121 Wisconsin Avenue, Suite 350 Washington, DC 20005	WRC-TV NBC Telernundo License Co. 1299 Pennsylvania Avenue, NW 9th Floor Washington, DC 20004

WJZ-TV CBS Corporation 1800 K Street, N.W., Suite 920 Washington, DC 20006	WBAL-TV 11 3800 Hooper Ave. Baltimore, MD 21211
WMPB Maryland Public Broadcasting Commission 11767 Owings Mills Boulevard Owings Mills, MD 21117	WMJF-LP Towson University c/o WMJF, Department of Electronic Media & Film Towson, MD 21252-0001
WNUV Baltimore (WNUV-TV) Licensee, Inc. 2000 West 41st Street Baltimore, MD 21211	WMAR-TV Scripps Media, Inc, 312 Walnut Street, 28th Floor Cincinnati, OH 45202-4067
WMPT Maryland Public Broadcasting Commission 11767 Owings Mills Boulevard Owings Mills, MD 21117	WUTB Fox Television Stations, Inc. 444 N. Capitol ST, NW, Suite 740 c/o Dianne Smith Washington, DC 20001

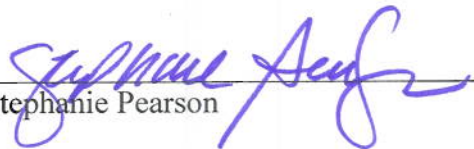

Stephanie Pearson

EXHIBIT A

[People](#)[Business](#)[Geography](#)[Data](#)[Research](#)[Newsroom](#)[Go](#)[State & County QuickFacts](#)

Maryland County Selection Map

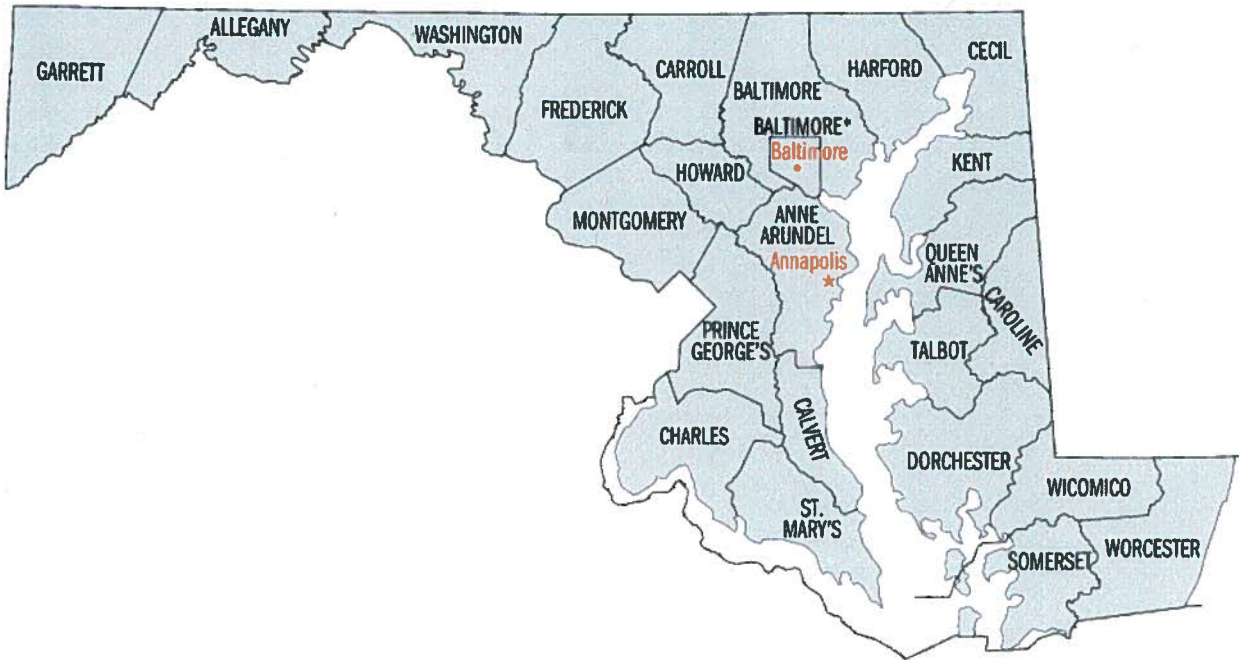


EXHIBIT B

Significantly Viewed List

Last Modified: **June 28, 2013**

This list of significantly viewed stations is being posted on the Commission's Internet website at <http://transition.fcc.gov/mb/> in accordance with 47 U.S.C. § 340(c)(2). This list was adopted on November 2, 2005 as Appendix C to the Report and Order, FCC 05-187 (rel. Nov. 3, 2005). The Commission will update this list within 10 business days after taking an action to modify the list.

The stations listed below are "significantly viewed" in the relevant counties and/or communities as indicated. The stations are listed by state and subdivided by the county in which they are significantly viewed. Stations added on a community-by-community basis after 1972 are listed at the end of each state next to the community in which they obtained significantly viewed status. The station listing includes the current (and former) call signs, as well as the analog channel number and city of license. Stations with a plus sign (+) under individual counties are those stations added to the list after the publication of the Commission's original 1972 list. *See Reconsideration of the Cable Television Report and Order*, 36 FCC 2d 326 (1972). Stations listed with a pound sign (#) have been the subject of application of the Commission's exclusivity rules and are subject to programming deletions in the indicated communities.

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Federal Communications Commission

Significantly Viewed TV Stations List

WGME-TV, 13, Portland, ME (formerly WGAN)

Waldo

WLBZ, 2, Bangor, ME

WABI-TV, 5, Bangor, ME

WVII-TV, 7, Bangor, ME (formerly WEMT)

Washington

WLBZ, 2, Bangor, ME

WABI-TV, 5, Bangor, ME

WVII-TV, 7, Bangor, ME (formerly WEMT)

CHSJ, 4, Canada

York

WCSH, 6, Portland, ME

WMTW-TV, 8, Portland, ME

WGME-TV, 13, Portland, ME (formerly WGAN)

+WPXT, 51, Portland, ME

#WBZ-TV, 4, Boston, MA³⁶

WCVB-TV, 5, Boston, MA (formerly WHDH)

WHDH-TV, 7, Boston, MA (formerly WNAC)

Berwick – WCSH, WPXG, WMUR-TV, WFXT

Elliot – WCSH, WPXG, WMUR-TV, WFXT

Kittery – WCSH, WPXG, WMUR-TV, WFXT

South Berwick – WCSH, WPXG, WMUR-TV, WFXT

MARYLAND

Allegany

WTTG, 5, Washington, DC

WJLA-TV, 7, Washington, DC (formerly WMAL)

WUSA, 9, Washington, DC (formerly WTOP)

WJAC-TV, 6, Johnstown, PA

Anne Arundel

WMAR-TV, 2, Baltimore, MD

WBAL-TV, 11, Baltimore, MD

WJZ-TV, 13, Baltimore, MD

+WNUV, 54, Baltimore, MD

WRC-TV, 4, Washington, DC

WTTG, 5, Washington, DC

³⁶ Affected communities are Lebanon and Biddleford, Maine.

Federal Communications Commission

Significantly Viewed TV Stations List

WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Baltimore including Baltimore City

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
WTTG, 5, Washington, DC
+WDCA, 20, Washington, DC

Calvert

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
+WDCA, 20, Washington, DC
WMAR-TV, 2, Baltimore, MD

Caroline

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WTTG, 5, Washington, DC

Carroll

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Cecil

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
KYW-TV, 3, Philadelphia, PA
WPVI-TV, 6, Philadelphia, PA (formerly WFIL)
WCAU, 10, Philadelphia, PA

Federal Communications Commission

Significantly Viewed TV Stations List

WGAL, 8, Lancaster, PA

Charles

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Dorchester

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WBOC-TV, 16, Salisbury, MD
+WMDT, 47, Salisbury, MD
WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)

Frederick

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
+WDCA, 20, Washington, DC
WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD

Garrett

KDKA-TV, 2, Pittsburgh, PA
WTAE-TV, 4, Pittsburgh, PA
WJAC-TV, 6, Johnstown, PA
+WWCP-TV, 8, Johnstown, PA

Harford

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WTTG, 5, Washington, DC

Federal Communications Commission

Significantly Viewed TV Stations List

Howard

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Kent

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WUSA, 9, Washington, DC (formerly WTOP)

Montgomery

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Prince Georges

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
WDCA, 20, Washington, DC

Queen Annes

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WTTG, 5, Washington, DC

St. Marys

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC

Significantly Viewed TV Stations List

WJLA, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
+WDCA, 20, Washington, DC
WMAR-TV, 2, Baltimore, MD

Somerset

WBOC-TV, 16, Salisbury, MD
+WMDT, 47, Salisbury, MD
#WTTG, 5, Washington, DC³⁷

Talbot

WMAR-TV, 2, Baltimore, MD
WBAL-TV, 11, Baltimore, MD
WJZ-TV, 13, Baltimore, MD
+WNUV, 54, Baltimore, MD
WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)

Washington

WRC-TV, 4, Washington, DC
WTTG, 5, Washington, DC
WJLA-TV, 7, Washington, DC (formerly WMAL)
WUSA, 9, Washington, DC (formerly WTOP)
+WDCA, 20, Washington, DC
WHAG-TV, 25, Hagerstown, MD
WMAR-TV, 2, Baltimore, MD

Wicomico

WBOC-TV, 16, Salisbury, MD
+WMDT, 47, Salisbury, MD
#WMAR-TV, 2, Baltimore, MD³⁸
#WBAL-TV, 11, Baltimore, MD³⁹
#WJZ-TV, 13, Baltimore, MD⁴⁰
WTTG, 5, Washington, DC

Worcester

WBOC-TV, 16, Salisbury, MD
WMDT, 47, Salisbury, MD
#WTTG, 5, Washington, DC⁴¹

³⁷ Affected area is the unincorporated areas of Somerset County, MD

³⁸ Affected communities are Salisbury, Delmar, Fruitland, Hebron and unincorporated areas of Wicomico County, MD

³⁹ Affected area are Salisbury, Maryland and the unincorporated areas of Wicomico County, MD

⁴⁰ Affected area are Salisbury, Maryland and the unincorporated areas of Wicomico County, MD

Significantly Viewed TV Stations List

Barclay – WJZ-TV, WBOC-TV, WMDT, WTTG
Betterton -- WBFF
Brookview – WJZ-TV, WBOC-TV, WMDT, WTTG
Centreville – WBFF, WNUV
Chestertown -- WBFF
Church Hill – WBFF, WNUV
Denton – WJZ-TV, WBOC-TV, WMDT, WTTG
East New Market – WJZ-TV, WBOC-TV, WMDT, WTTG
Eldorado – WJZ-TV, WBOC-TV, WMDT, WTTG
Federalsburg – WJZ-TV, WBOC-TV, WMDT, WTTG
Galena -- WBFF
Galestown – WJZ-TV, WBOC-TV, WMDT, WTTG
Goldsboro – WJZ-TV, WBOC-TV, WMDT, WTTG
Greensboro – WJZ-TV, WBOC-TV, WMDT, WTTG
Henderson – WJZ-TV, WBOC-TV, WMDT, WTTG
Hillsboro – WJZ-TV, WBOC-TV, WMDT, WTTG
Hurlock – WJZ-TV, WBOC-TV, WMDT, WTTG
Mardela Springs – WJZ-TV, WBOC-TV, WMDT, WTTG
Marydel – WJZ-TV, WBOC-TV, WMDT, WTTG
Millington – WBFF, WNUV
Preston – WJZ-TV, WBOC-TV, WMDT, WTTG
Queen Anne – WJZ-TV, WBOC-TV, WMDT, WTTG
Ridgely – WJZ-TV, WBOC-TV, WMDT, WTTG
Secretary – WJZ-TV, WBOC-TV, WMDT, WTTG
Sharptown – WJZ-TV, WBOC-TV, WMDT, WTTG
Sudlersville – WBFF, WNUV
Templeville – WJZ-TV, WBOC-TV, WMDT, WTTG
Vienna – WJZ-TV, WBOC-TV, WMDT, WTTG
Unincorporated areas of Caroline County – WJZ-TV, WBOC-TV, WMDT, WTTG
Unincorporated areas of Dorchester County – WJZ-TV, WBOC-TV, WMDT, WTTG
Unincorporated areas of Kent County -- WBFF
Unincorporated areas of Queen Annes County – WBFF, WNUV

MASSACHUSETTS

Barnstable
WBZ-TV, 4, Boston, MA
WCVB-TV, 5, Boston, MA (formerly WHDH)
WHDH-TV, 7, Boston, MA (formerly WNAC)
+WDPX, 58, Vineyard, MA (formerly WCVX, WZBU)
WLNE-TV, 6, Providence, RI (formerly WTEV)

⁴¹ Affected communities are Salisbury, Delmar, Fruitland, Hebron and unincorporated areas of Wicomico County, MD

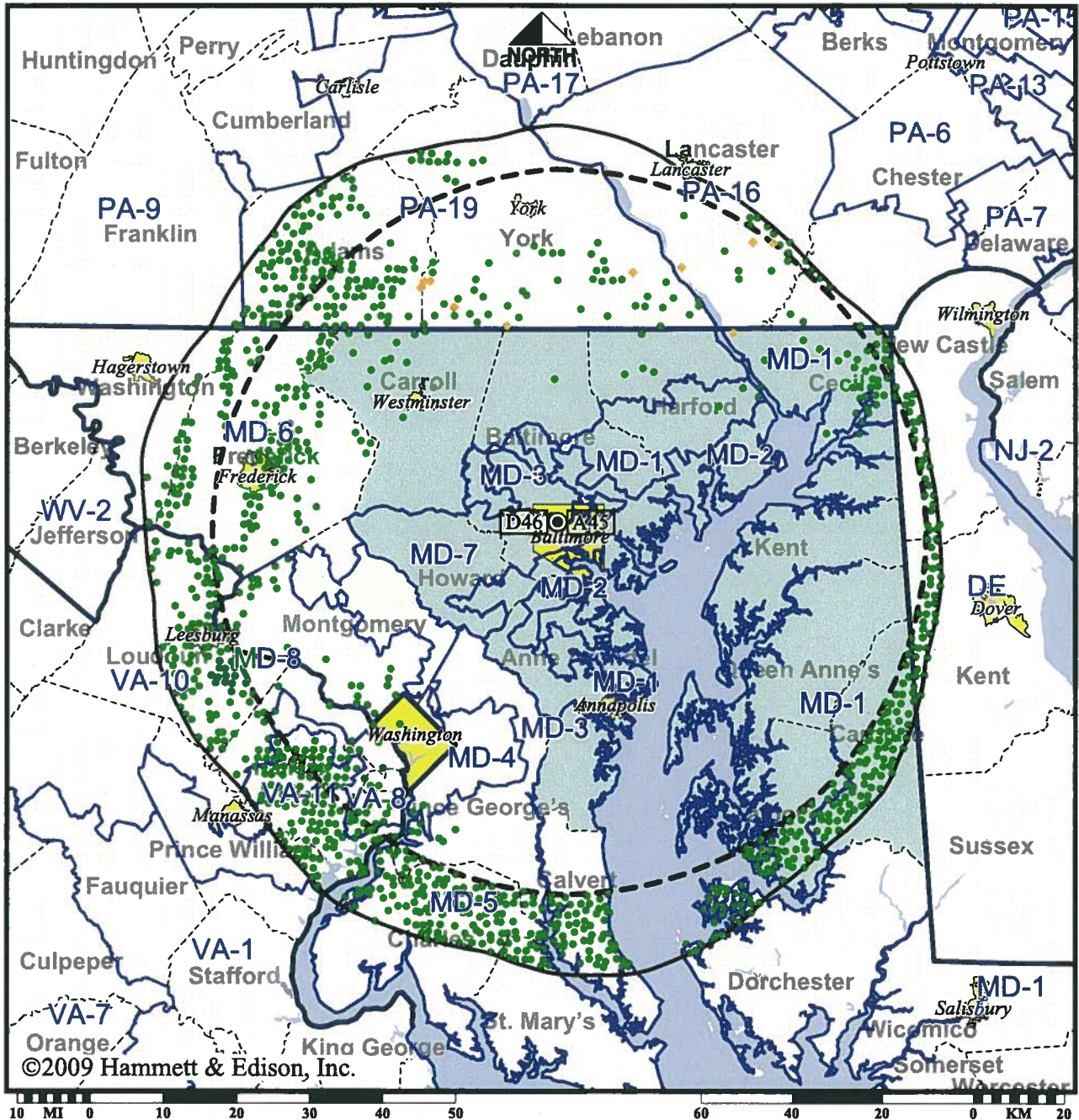
EXHIBIT C

TV Station WBFF • Analog Channel 45, DTV Channel 46 • Baltimore, MD

Approved Post-Transition Operation: Granted Construction Permit

**Digital CP (solid): 550 kW ERP at 373 m HAAT, Network: Fox
vs. Analog (dashed): 1290 kW ERP at 386 m HAAT, Network: Fox**

Market: Baltimore, MD



- Coverage gained after DTV transition
- No symbol = no change in coverage
- ◆ Coverage lost but still served by same network

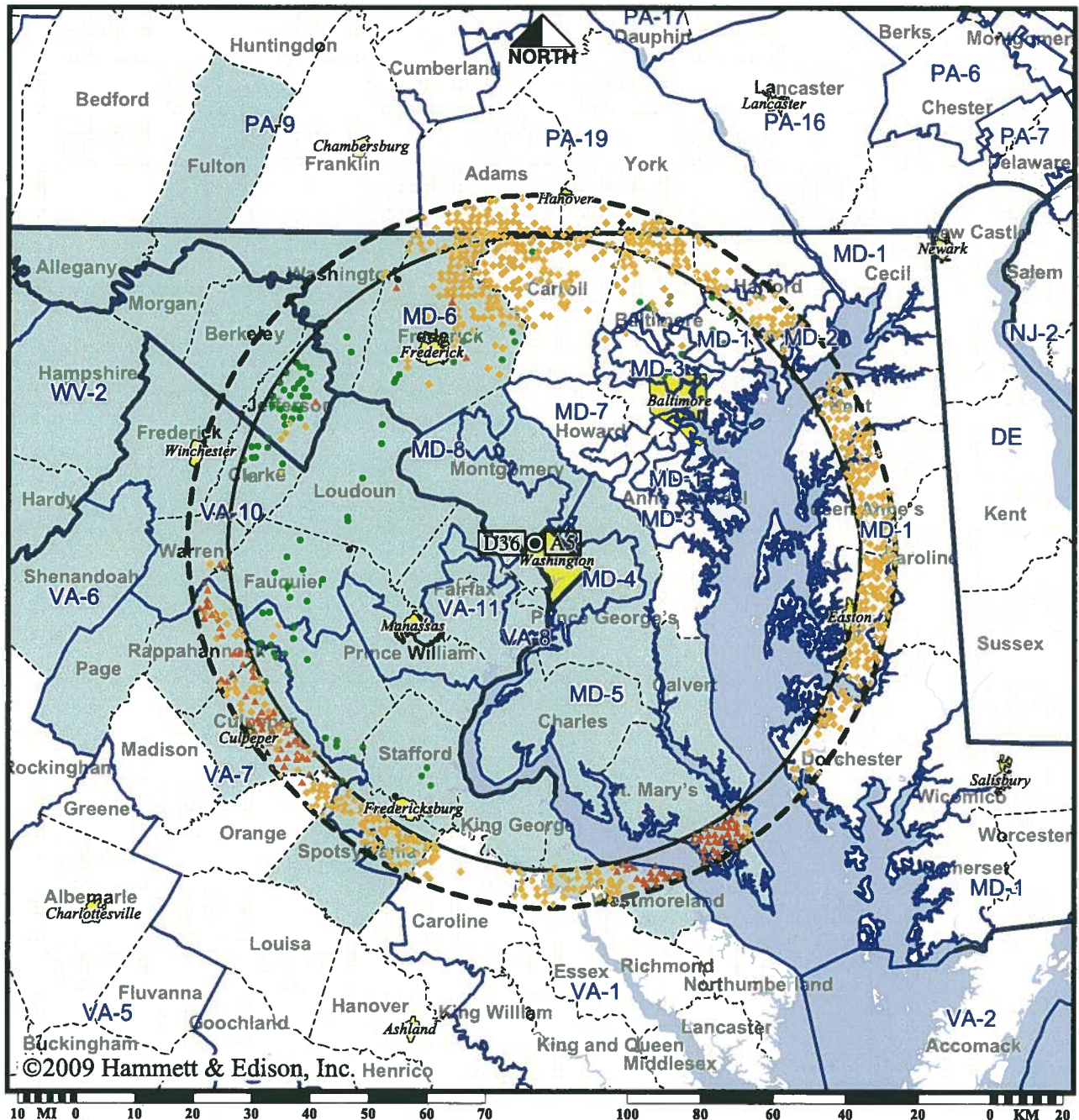
Analog service	5,670,101 persons
Digital service	6,862,226
Analog loss	10,950
Digital gain	1,203,075
Net gain	1,192,125

TV Station WTTG • Analog Channel 5, DTV Channel 36 • Washington, DC

Expected Operation on June 13: Granted Construction Permit

Digital CP (solid): 1000 kW ERP at 227 m HAAT, Network: Fox
vs. Analog (dashed): 100 kW ERP at 235 m HAAT, Network: Fox

Market: Washington, DC



- Coverage gained after DTV transition
- No symbol = no change in coverage
- ◆ Coverage lost but still served by same network
- ▲ Coverage lost and no other service by same network

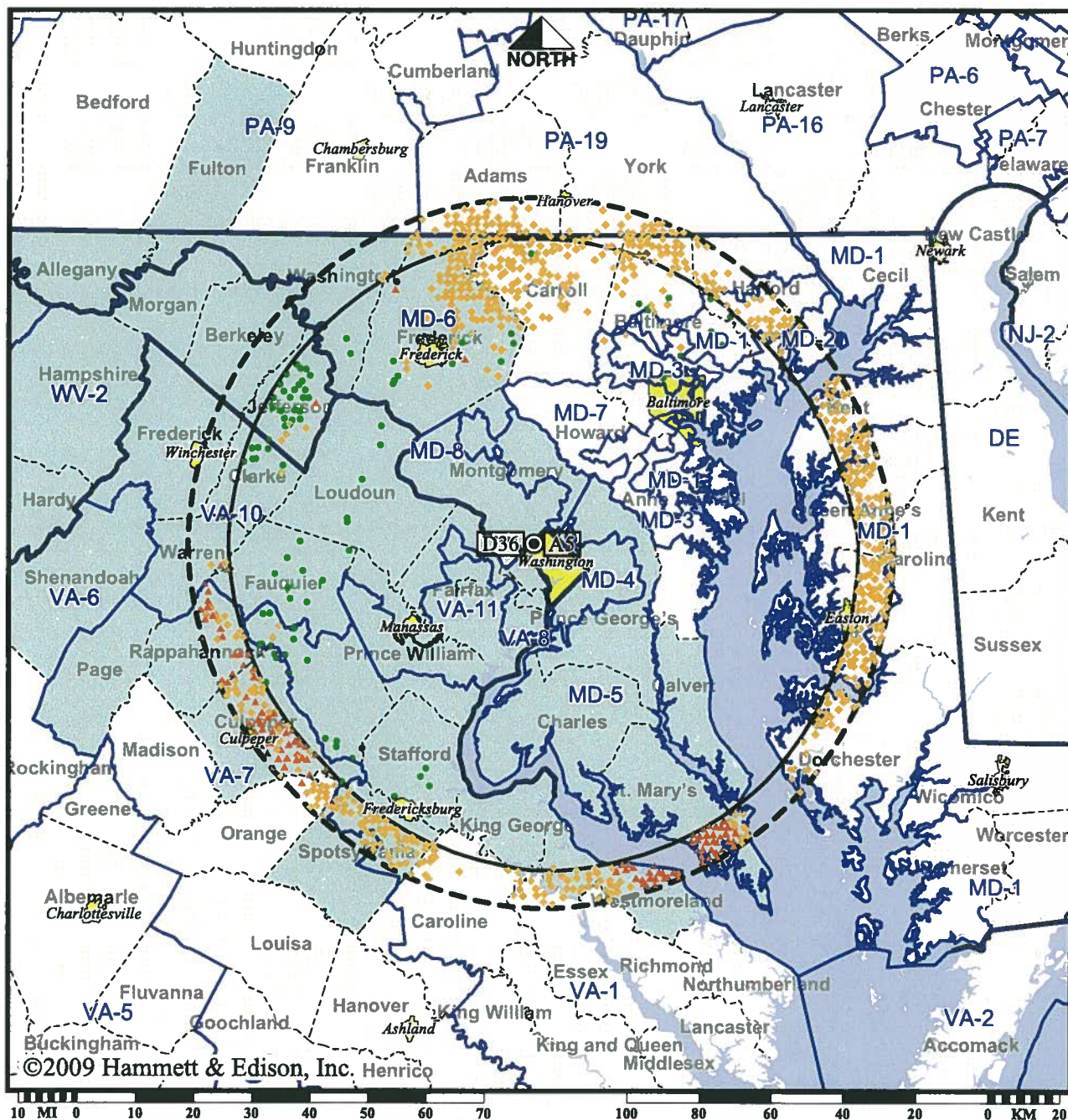
Analog service	7,279,064 persons
Digital service	7,016,804
Analog loss	292,308
Digital gain	30,048
Net gain	-262,260

TV Station WTTG • Analog Channel 5, DTV Channel 36 • Washington, DC

Approved Post-Transition Operation: Granted Construction Permit

**Digital CP (solid): 1000 kW ERP at 227 m HAAT, Network: Fox
vs. Analog (dashed): 100 kW ERP at 235 m HAAT, Network: Fox**

Market: Washington, DC



- Coverage gained after DTV transition
- No symbol = no change in coverage
- ◆ Coverage lost but still served by same network
- ▲ Coverage lost and no other service by same network

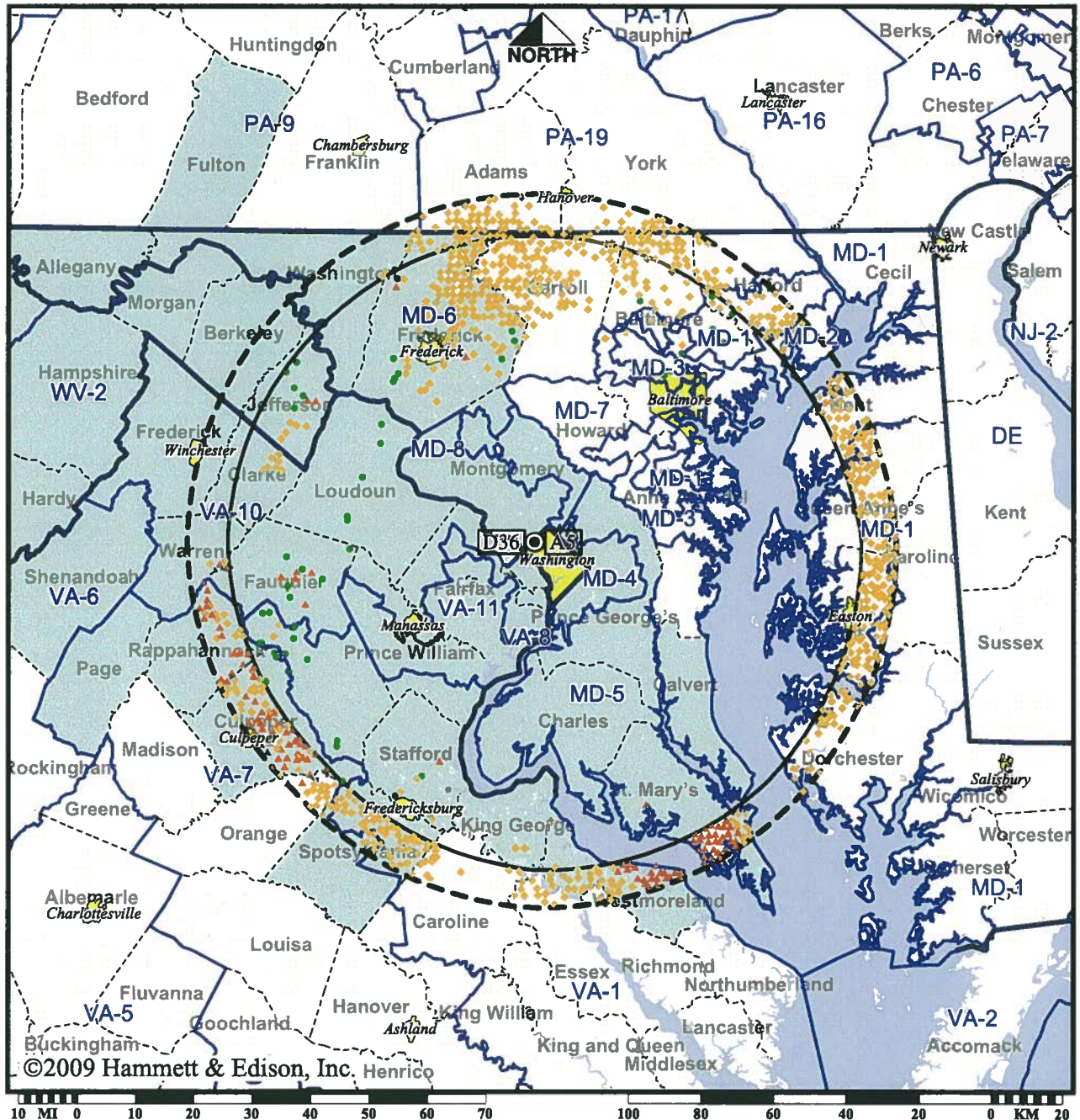
Analog service	7,279,064 persons
Digital service	7,016,804
Analog loss	292,308
Digital gain	30,048
Net gain	-262,260

TV Station WTTG • Analog Channel 5, DTV Channel 36 • Washington, DC

Approved or Requested Post-Transition Operation: Granted Construction Permit

**Digital CP (solid): 1000 kW ERP at 227 m HAAT, Network: Fox
vs. Analog (dashed): 100 kW ERP at 235 m HAAT, Network: Fox**

Market: Washington, DC



- Coverage gained after DTV transition
- No symbol = no change in coverage
- ◆ Coverage lost but still served by same network
- ▲ Coverage lost and no other service by same network

Analog service	7,279,064 persons
Digital service	6,980,272
Analog loss	319,319
Digital gain	20,527
Net gain	-298,792

BPCDT-20080313ACG
WTTG Digital CP

EXHIBIT D

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re:

Chesapeake Television Licensee, LLC

Petition for Special Relief for Waiver of
Section 76.92(f) & 76.106(a) of the
Commission's Rules

Docket No. 13-181

CSR-8818-N

DECLARATION OF LAURA NEUMAN

I, Laura Neuman, hereby declare, under penalty of perjury that:


1. I am the County Executive of Anne Arundel County, Maryland.
2. I have read the foregoing Opposition to Petition for Special Relief ("Opposition") and am familiar with the contents thereof and the matters referred to therein.
3. Residents of Anne Arundel County have close and enduring ties to the nation's capital. I strongly believe that it is important for WTTG (and other Washington, DC based stations) to continue to be fully available to all residents of Anne Arundel County, including residents of the unincorporated community of Glen Burnie.
4. Many County residents work in Washington, DC or in surrounding counties that are part of the Washington, DC Designated Market Area (DMA). This is evident in the data contained in Attachment 1 hereto which is an analysis of daily commuter traffic flow from Anne Arundel County prepared by the Fort Meade Regional Growth Management Committee (RGMC) based

on recent Census Data. On a daily basis a significant percentage of Anne Arundel County residents leave the County to commute to surrounding cities and counties. The analysis shows that more commuters who leave the County travel to Washington, DC and surrounding counties that are part of the Washington, DC DMA than to Baltimore City and surrounding counties in the Baltimore DMA (59,806 to the Washington DMA vs. 53,685 to the Baltimore DMA).

5. Washington, DC is also important to residents who both live and work in Anne Arundel County because the federal government is a major employer in County. The County is home to military installations, such as the United States Naval Academy and Fort George Meade, and to the National Security Agency.

6. Blocking access to programming on Washington, DC-based WTTG for Anne Arundel County residents whose work and business affiliations are in the District of Columbia and counties in the Washington, DC DMA, not only takes away something that these residents have enjoyed for more than 40 years, it also takes away their freedom to choose their personal preference in television viewing.

Dated: July 31, 2013
Annapolis, Maryland



Laura Neuman, County Executive
Anne Arundel County, Maryland

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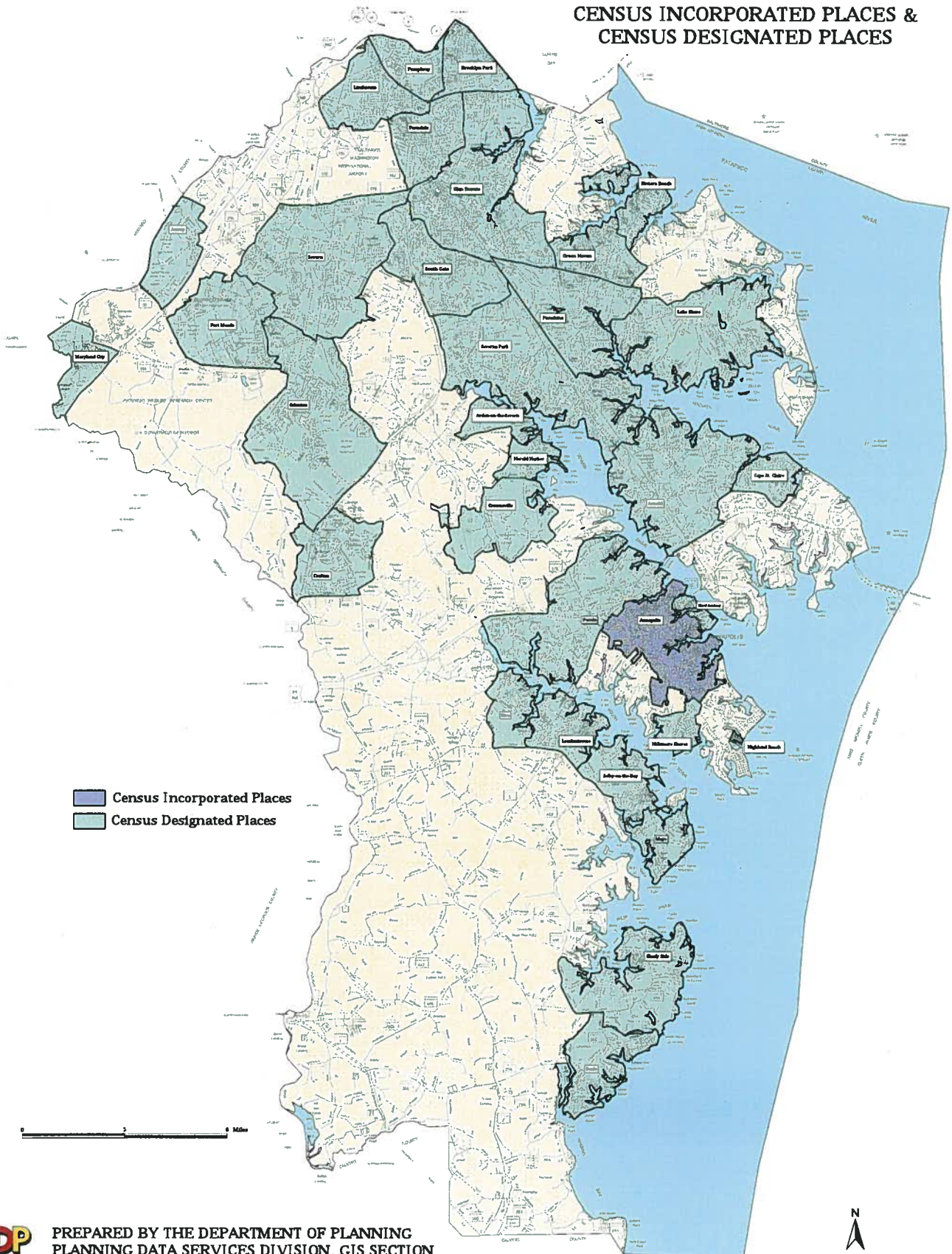
Commuter Flow From / To Anne Arundel County

DAILY COMMUTER FLOW			
From AAC	To / From	To AAC	Total
21,719	Baltimore City	15,515	37,234
12,176	Baltimore County	23,930	36,106
567	Carroll	4,156	4,723
17,781	DC	861	18,642
446	Frederick	804	1,250
649	Harford	3,886	4,535
17,708	Howard	15,432	33,140
7,035	Montgomery	2,761	9,796
25,673	Prince George's	9,008	34,681
866	Queen Anne's / Talbot	4,950	5,816
8,871	Other	-	8,871
113,491	Sub-total	81,303	194,794
153,413	Anne Arundel	153,413	153,413
266,904	Total	234,716	348,207

EXHIBIT E

ANNE ARUNDEL COUNTY, MD

CENSUS INCORPORATED PLACES & CENSUS DESIGNATED PLACES



PREPARED BY THE DEPARTMENT OF PLANNING
PLANNING DATA SERVICES DIVISION, GIS SECTION

SOURCE OF INFORMATION: THE INFORMATION ON THIS MAP WAS PREPARED FROM THE 2000
VERSION OF THE U.S. CENSUS BUREAU'S TIGERLINE DATABASE FOR ANNE ARUNDEL COUNTY.
MAP SCALE: 1 INCH EQUALS 1 MILE (1:63,360)

EXHIBIT F

EXHIBIT – ANNE ARUNDEL COUNTY CUIDS

Source: FCC Encyclopedia, <http://www.fcc.gov/encyclopedia/cable-communities-registered-fcc>

CUID	Community Name	Municipality Type	County Name	Legal Name	Status	PSID	Date Operational
MD0054	ANNAPOLIS	Incorporated City	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	020662	4/1/1971
MD0059	ANNE ARUNDEL NORTH ANNE	Unincorporated unnamed area within a County or Parish	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	020662	5/1/1980
MD0060	ARUNDEL	Unincorporated unnamed area within a County or Parish	ANNE ARUNDEL	ANNE ARUNDEL BROADBAND, LLC	Active	003217	4/1/1979
MD0211	CROFTON	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	9/1/1980
MD0212	GAMBRILLS	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	9/1/1987
MD0213	CAPE ST CLAIRE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	9/1/1982
MD0214	ARNOLD	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	9/1/1982
MD0215	SEVERNA PARK	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1982
MD0216	MILLERSVILLE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1981
MD0217	ODENTON	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1982
MD0218	GLEN BURNIE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1983
MD0219	CROWNSVILLE U S NAVAL	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1986
MD0232	ACADEMY	State or Federal Reservation	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	020662	7/1/1982
MD0262	ANNE ARUNDEL (S)	Unincorporated unnamed area within a County or Parish	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	020662	7/1/1986
MD0264	PASADENA	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	12/1/1985
MD0266	BOONES M H ESTATES	Privately owned settlement (incl. Apts., Condos, Parks, etc.)	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	020662	2/1/1986

EXHIBIT – ANNE ARUNDEL COUNTY CUIDS

MD0270	ANNAPOLIS	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1983
MD0271	HANOVER	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	6/1/1985
MD0272	MARYLAND CITY	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	7/1/1985
MD0273	SEVERN	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	12/1/1985
MD0294	DAVIDSONVILLE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1984
MD0295	HARMANS	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1985
MD0296	JESSUP	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1986
MD0297	LAUREL	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	7/1/1985
MD0298	SHERWOOD FOREST	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1985
MD0313	FT MEADE	State or Federal Reservation	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1985
MD0337	GIBSON ISLAND	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/1988
MD0338	LINTHICUM	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	5/1/1988
MD0339	GLEN BURNIE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	11/1/1987
MD0399	ANNE ARUNDEL COUNTY	Unincorporated unnamed area within a County or Parish	ANNE ARUNDEL	VERIZON MARYLAND LLC	Active	020654	8/1/2006
MD0417	ANNAPOLIS	Incorporated City	ANNE ARUNDEL	VERIZON MARYLAND LLC	Active	020654	1/1/2007
MD0425	HIGHLAND BEACH	Incorporated Town	ANNE ARUNDEL	VERIZON MARYLAND LLC	Active	020654	3/1/2007
MD0449	HIGHLAND BEACH	Incorporated City	ANNE ARUNDEL	COMCAST OF MARYLAND, LLC	Active	004666	1/1/2007
MD0473	FORT MEADE	Unincorporated Area Commonly Known As	ANNE ARUNDEL	VERIZON MARYLAND LLC	Active	020654	7/1/2012

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